

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ALI KARIMI, Individually and On Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT, JOHN
CRYAN, AND CHRISTIAN SEWING,

Defendants.

Case No. 1:22-cv-02854-JSR

**NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that, pursuant to the Court’s Order Preliminarily Approving Settlement and Providing for Notice (ECF No. 102), on January 31, 2023 at 9:00 a.m., before the Honorable Jed S. Rakoff in Courtroom 14-B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, or by telephonic, video conferencing or other electronic means, as posted on the website of the Claims Administrator, Court-appointed Lead Plaintiff Yun Wang (“Lead Plaintiff”) and Named Plaintiff Ali Karimi (“Named Plaintiff” and, together with Lead Plaintiff, the “Plaintiffs”) will and hereby do move the Court to: (1) grant final approval of the Settlement in the above-captioned action on the terms set forth in the Stipulation and Agreement of Settlement dated September 23, 2022 (“Stipulation”; ECF No. 101-1); and (2) approve the proposed Plan of Allocation for distribution of the Net Settlement Fund.¹

This motion is based on this Notice of Motion; the memorandum of law in support thereof; the Declaration of Emma Gilmore in Support of: (I) Lead Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees, Reimbursement of Litigation Expenses, and Compensatory Awards to Plaintiffs; all exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court. Defendants do not oppose this motion.

Dated: December 27, 2022

Respectfully submitted,

/s/ Emma Gilmore
Jeremy A. Lieberman
Emma Gilmore
Dolgora Dorzhieva
Villi Shteyn
POMERANTZ LLP

¹ Unless otherwise defined, all capitalized terms used herein have the meanings ascribed to them in the Stipulation.

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*Additional Counsel for Plaintiffs and for the
Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of December 2022, a true and correct copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Emma Gilmore

Emma Gilmore